

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**ENRIQUE ROBERTO “HENRY”
CUELLAR and IMELDA RIOS
CUELLAR,**

Defendants.

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No. 4:24-cr-224

**GOVERNMENT’S APPLICATION TO DESIGNATE A
CLASSIFIED INFORMATION SECURITY OFFICER**

The United States of America respectfully requests that the Court designate a Classified Information Security Officer (CISO) under the Classified Information Procedures Act (CIPA), 18 U.S.C. app. 3, and Section 2 of the Revised Security Procedures established by the Chief Justice of the United States under CIPA § 9(a).

1. A grand jury returned an indictment on April 30, 2024, charging Enrique “Henry” Cuellar and Imelda Cuellar with conspiracy, bribery, honest services wire fraud, being a public official acting as an agent of a foreign principal, money laundering conspiracy, and money laundering. ECF No. 1. Their initial appearance was on May 3, 2024. Minute Entry, May 3, 2024. Trial is currently set for July 8, 2024. Scheduling Order, May 3, 2024, ECF No. 15.

2. Section 2 of the Revised Security Procedures established by the Chief Justice under CIPA § 9(a) says:

Classified Information Security Officer. In any proceeding in a criminal case ... in which classified information is within, or is reasonably expected to be within, the custody of the court, the court will designate a “classified information security officer.” The Attorney General or the Department of Justice Security Officer will recommend to the court a person qualified to serve as a classified information security officer. This individual will be

selected from the Litigation Security Group, Security and Emergency Planning Staff, Department of Justice, to be detailed to the court to serve in a neutral capacity. The court may designate, as required, one or more alternate classified information security officers who have been recommended in the manner specified above. ...

The classified information security officer will be responsible to the court for the security of all classified information in the court's custody, including, but not limited to, any pleadings or other filings created in connection with the proceedings, and any form of information contained in any format, including testimony, notes, photographs, transcripts, documents, digital files, audio files or video files, stored on any type of equipment (*e.g.*, computers, electronic storage devices, etc.). In addition, any matters relating to personnel, information, or communications security will be the responsibility of the classified information security officer who will take measures reasonably necessary to fulfill these responsibilities.

3. To assist the Court and Court personnel in reviewing classified information and handling any other issues concerning classified information in this case, the government respectfully requests that the Court designate Winfield S. "Scooter" Slade as the CISO for this case to perform the duties assigned to CISOs in the Security Procedures established by the Chief Justice.

4. The government also requests that the Court designate the following individuals as alternate CISOs to serve if Mr. Slade is unavailable: Jennifer H. Campbell, Daniel O. Hartenstine, Daniella M. Medel, Matthew W. Mullery, and Harry J. Rucker.

Dated: May 8, 2024

COREY R. AMUNDSON
Chief, Public Integrity Section
Criminal Division
U.S. Department of Justice

By: /s/ Marco A. Palmieri
Marco A. Palmieri
Rosaleen O'Gara
Celia Choy
Attorneys for the United States

Respectfully submitted,

JENNIFER KENNEDY GELLIE
Executive Deputy Chief
performing the duties of Chief
Counterintelligence and Export Control Section
National Security Division
U.S. Department of Justice

By: /s/ Garrett Coyle
Garrett Coyle
Attorney for the United States

CERTIFICATE OF SERVICE

I certify that I filed this application via the CM/ECF system on May 8, 2024, which caused the motion to be electronically served on all counsel of record.

/s/ Garrett Coyle
Garrett Coyle